

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of Telecommunications )  
and Energy to Establish a Surcharge to Recover Prudently ) D.T.E. 03-63  
Incurred Costs Associated with the Provision of Wireline )  
Enhanced 911 Services, Relay Services for TDD/TYY Users, )  
Communications Equipment Distribution for People with )  
Disabilities, and Amplified Handsets at Pay Telephones. )  
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**PETITION FOR LEAVE TO INTERVENE OF  
SPRINT COMMUNICATIONS COMPANY L.P.**

Pursuant to 220 CMR § 1.03 of the regulations of the Massachusetts Department of Telecommunications and Energy (“Department”), Sprint Communications Company L.P. (“Sprint”) respectfully submits this Petition for Leave to Intervene (“Petition”) in the above-captioned proceeding. In support of this Petition, Sprint states the following:

1. Sprint is a telecommunications carrier authorized by the Department to provide intrastate services in the Commonwealth in competition with Verizon Massachusetts (“Verizon MA”).
2. The Department has opened an investigation to establish a surcharge to recover prudently incurred costs associated with the provision of wireline enhanced 911 service, relay services for TDD/TYY users, communications equipment distribution for people with disabilities, and amplified handsets at pay telephones (“E911 Surcharge”). The surcharge will appear on retail customers’ telephone bills.

3. Sprint is a provider of local exchange, interexchange, and wireless telecommunications services in Massachusetts. This investigation could impact the terms and conditions under which Sprint's services are provided to its customers, including applicable surcharges. Any surcharges adopted or implemented in this proceeding should be equitable and necessary.

4. Sprint's interest in this matter cannot be adequately addressed or represented by any other party. Consequently, Sprint's participation in this proceeding will help ensure the development of a comprehensive record, while affording Sprint the opportunity to protect its interests.

5. The extent of Sprint's participation in this docket will depend upon the scope of the proceeding as determined by the Department and the parties to this proceeding. Depending upon the schedule and specific issues in this proceeding, Sprint may file comments, reply comments and other pleadings in this investigation.

6. All correspondence and other documents with respect to this matter should be directed to the following:

Craig D. Dingwall  
Sprint Communications Company L.P.  
401 9<sup>th</sup> Street, N.W.  
Suite 400 Washington, D.C. 20004  
(202) 585-1936  
(202) 585-1894 (FAX)  
[craig.d.dingwall@mail.sprint.com](mailto:craig.d.dingwall@mail.sprint.com)

7. Sprint requests the Department to grant Sprint's Petition.

Respectfully submitted,

SPRINT COMMUNICATIONS COMPANY L.P.

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Craig D. Dingwall  
Director and General Attorney  
401 9<sup>th</sup> Street, N.W., Suite 400  
Washington, D.C. 20004  
202-585-1936  
[craig.d.dingwall@mail.sprint.com](mailto:craig.d.dingwall@mail.sprint.com)

Its Attorney

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